

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
FOURTH REGION**

RR DONNELLEY AND SONS, INC.<sup>1</sup>

Employer

and

Case 4-RC-21446

INTERNATIONAL CHEMICAL WORKERS  
COUNCIL OF THE UFCW<sup>2</sup>

Petitioner

**REGIONAL DIRECTOR'S DECISION AND  
DIRECTION OF ELECTION**

The Employer, RR Donnelley and Sons, Inc., provides printing services from facilities around the world, including the facility in Breinigsville, Pennsylvania (the Facility) involved in this case. The Petitioner, International Chemical Workers Council of the UFCW, filed a petition with the National Labor Relations Board under Section 9(c) of the National Labor Relations Act seeking to represent a unit of the Employer's printing and binding employees at the Facility. The Employer contends that the Petitioner's proposed unit is inappropriate and that the only appropriate unit would include all employees dedicated to the printing and "fulfillment" processes, which include, in addition to the employees sought in the petition, pre-press employees, kitting employees,<sup>3</sup> material handlers, warehouse employees, and forklift drivers, as well as the maintenance employee. The Petitioner's proposed unit would include about 27 employees, while the Employer's proposed unit includes approximately 120 employees. The Petitioner is willing to proceed to an election in any unit found appropriate.

A Hearing Officer of the Board held a hearing, and the parties filed briefs.<sup>4</sup> I have considered the evidence and the arguments presented by the parties, and, as discussed below, I have

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<sup>1</sup> The Employer's name appears as amended at the hearing.

<sup>2</sup> The Petitioner's name appears as amended at the hearing.

<sup>3</sup> The record is unclear as to whether the Petitioner seeks to include kitting employees in the unit. The unit sought on the face of the petition includes "employees in the Print Center (printing/binding)," and excludes "warehouse, clerical and supervisor employees and those excluded by the Act," but the petition makes no reference to kitting employees, and the Petitioner did not clarify its intention on the record. Based on the reasoning set forth in this Decision, however, kitting employees should be included in the unit regardless of the Petitioner's preference.

<sup>4</sup> The Employer's unopposed request to correct the transcript at page 44, line 5 from "hold punch" to "hole punch" is granted.

concluded that the Petitioner's proposed unit is not appropriate and that the Employer's proposed unit is the smallest appropriate unit. Accordingly, I have directed an election in a unit of pre-press employees, print operators, binding operators, kitting employees, material handlers, warehouse employees, forklift drivers, and the maintenance employee.

To provide a context for my discussion, I will first present an overview of the Employer's operations. Then, I will review the factors that must be evaluated in determining the appropriate unit. Finally, I will present in detail the facts and reasoning that support my conclusion.

## **I. OVERVIEW OF OPERATIONS**

At the Facility, the Employer prints documents primarily by using an assortment of copy machines.<sup>5</sup> Almost 97 percent of the work at the Facility involves digital printing, and the remainder is offset printing for which the Employer uses employees provided by a contractor. Most of the documents are printed in black and white. After documents are printed, employees engage in the "fulfillment process," in which they gather and prepare documents in different ways pursuant to customer needs and ready them for shipping.

The Facility is a rectangular one-story building of 565,000 square feet, with each function in the printing and fulfillment process laid out sequentially. The print area is in front of the binding area, which in turn is adjacent to the kitting area, and the warehouse is next to the kitting area.

The Employer employs approximately 120 employees at the Facility in four departments: Print, Warehouse, Emergency Health & Safety (EHS), and Maintenance. Within the Print Department are about 5 pre-press employees, 12 print operators, 15 binding operators, 12 kitting employees, and an unspecified number of material handlers.

Vice-President of Operations Michael Kulpinsky is the Chief Operating Officer, and in this capacity he manages the entire Facility. Each department has a department head who reports to Kulpinsky. On the first shift, there is one supervisor for the Print Department and there are three supervisors for the Warehouse Department. On the second and third shifts, the same two or three supervisors oversee both departments.<sup>6</sup>

The Print Department is located in four areas. Pre-press employees work in the administrative office, print operators operate the copy machines in the printing area, binding employees work in the binding area, and kitting employees are in the kitting area. Some material handlers are located in the printing, binding, and kitting areas.<sup>7</sup>

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<sup>5</sup> In industry terms, this type of operation is known as "reprographics."

<sup>6</sup> A supervisory position for the second shift is presently vacant.

<sup>7</sup> The four offset printing employees supplied by the contractor also work in this area. No party contends that they should be included in the unit.

Included in the Warehouse Department are 80 employees classified as material handlers, warehouse employees, and forklift drivers.<sup>8</sup> The Warehouse Department employees are largely stationed in the warehouse area, but forklift drivers move packages throughout the facility.

The Maintenance Department has one regular, full-time maintenance employee who works throughout the facility as needed, changing light bulbs, performing general maintenance work, and making minor repairs to machines. When needed, the Employer contracts for additional maintenance help.

There are also several customer service employees and one employee who handles EHS concerns. These classifications are viewed as administrative, and neither party contends that they should be included in the unit.

Employees work on three shifts, five days a week. The first shift runs from 7:00 a.m. to 3:30 p.m.; the second shift is from 3:00 p.m. to 11:00 p.m.; and the third shift runs from 11:00 p.m. to 7:00 a.m. The first and fourth quarters of each year are considered “peak seasons” due to the large number of orders for financial reports printing. During these times, daily customer orders range from 2,000 to 17,000 documents, while in the other two quarters, there are orders for about 700 documents per day. In peak season, the Employer adds additional employees to the latter two shifts. There is no history of collective bargaining at the Facility.

## **II. LEGAL STANDARDS FOR DETERMINING THE APPROPRIATE UNIT**

The question of whether the petitioned-for unit is appropriate is governed by the Board’s community-of-interest standards. The Act does not require that a unit for bargaining be the only appropriate unit or even the most appropriate unit. Rather, the Act requires only that the unit be an appropriate one. *Overnite Transportation Co.*, 322 NLRB 723 (1996); *P.J. Dick Contracting, Inc.*, 290 NLRB 150 (1988); *Morand Bros. Beverage*, 91 NLRB 409, 418 (1950), enfd. 190 F.2d 576 (7<sup>th</sup> Cir. 1951). Thus, the Board’s procedure for determining an appropriate unit under Section 9(b) is first to examine the unit sought by the petitioner. If that unit is appropriate, the inquiry ends. *Bartlett Collins Co.*, 334 NLRB 484 (2001). If the petitioned-for unit is not appropriate, the Board may examine alternative units suggested by the parties, or it may select a unit different from the proposed alternative units. See, e.g., *Bartlett Collins Co.*, above; *Overnite Transportation Co.*, 331 NLRB 662, 663 (2000).

The Board generally attempts to select a unit that is the smallest appropriate unit encompassing the petitioned-for employee classifications. See, e.g., *R & D Trucking, Inc.*, 327 NLRB 531 (1999); *State Farm Mutual Automobile Insurance Co.*, 163 NLRB 677 (1967), enfd. 411 F.2d 356 (7<sup>th</sup> Cir. 1969), cert. denied, 396 U.S. 832 (1969). In determining whether a group of employees possesses a separate community of interest, the Board examines such factors as common functions and duties, shared skills, functional integration, temporary interchange, frequency of contact with other employees, commonality of wages, hours, and other working conditions, permanent transfers, and shared supervision. *Casino Aztar*, 349 NLRB No. 59 (2007); *Publix Super Markets*, 343 NLRB 1023 (2004); *Home Depot USA*, 331 NLRB 1289 (2000).

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<sup>8</sup> The record does not indicate how many employees are in each of these classifications.

### **III. FACTS**

#### *The Printing and Fulfillment Processes*

The Employer receives about 80 percent of customer print orders electronically and the remaining orders by fax or phone. The Employer processes all customer orders through its computer system.

Pre-press employees print the customers' requests in the form of job tickets, which display the specifications for the customers' orders, and place them in bins. Then, a production leadperson assigns jobs to print operators electronically from a computer station.<sup>9</sup> The print operators are responsible for loading the required paper and running the copy machines. Generally, they complete a job by following the instructions on the ticket and pressing the appropriate buttons on the machine for the specific quantity, type of copying, and other job details. Thereafter, the output is placed on a cart and sent for binding or kitting as needed.

Binding or kitting normally is required to complete an order. Binding employees use various types of equipment including shrink wrappers, padders, and hole punchers to bind the documents. Warehouse employees also assist in shrink wrapping if necessary. Kitting is the process of assembling a package of jobs ordered by the same customer. It may include collating two different products for one customer or taking items from the warehouse, such as printed forms or tape, to add to products before shipment. If required by the customer's order, kitting employees assemble documents in pocket folders, which are also stored in the warehouse.

When the printing, binding and/or kitting processes are complete, the product may be sent to the warehouse for picking, packing, and shipping. A packing list is created that details the tasks needed to complete the order. Using this list, warehouse employees generally pack completed orders and prepare them for shipping, but binding and kitting employees may also perform these tasks. The determination of which classification performs the picking and packing work may depend on what process is needed to complete an order. If the order is finished at the copy machine, e.g., by stapling, without binding or kitting, it may be sent for shipping directly by print operators or material handlers in the print area. Several material handlers are stationed at the back of the print area, rather than in the warehouse, to permit quicker distribution of completed orders to the customer. If the product requires collating, it will be sent for shipping directly by kitting employees.

Forklift drivers are routinely located in the printing, binding, and kitting areas, as well as in the warehouse. They move throughout the facility and may transport orders to the shipping area from any of these other areas. In the shipping area, Warehouse Department employees load completed orders on trucks for delivery to the customers.

Various employees initial the job ticket during the printing and fulfillment processes. A print operator initials the job ticket when a print job is produced, and another employee, usually a binding or kitting employee, initials the ticket when an order is finished. Then, another employee

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<sup>9</sup> No party contends that the production leadpersons are supervisors, and there was no evidence suggesting that they have supervisory authority.

from the binding, kitting or warehouse areas initials the ticket for quality control. Finally, another employee from the binding, kitting, or warehouse areas initials the ticket as the product is loaded on trucks for shipping.

### *Employee Contact and Interchange*

Employees in various classifications have regular and frequent contact with each other. They may interact when moving documents from one phase of the production process to the next. Additionally, material handlers and forklift drivers routinely work in the printing, binding and kitting areas, and binding operators and kitting employees regularly go to the warehouse to retrieve stored items that are needed to complete orders. Employees also often cover for employees in other areas when they are temporarily understaffed. During the half-year peak season, the Employer handles the increased volume of work, in part, by moving employees to the warehouse to assist in preparing orders for shipping. Pre-press, printing, binding, and kitting employees all work in the warehouse with Warehouse Department employees during busy times.

Print operators are normally the only employees that operate the copy machines, but in an emergency, pre-press employees may perform this task. The job description for printing employees requires, among other things, that they “assist Binding/Finishing personnel in their functions.” The binding employees' job description requires that they “perform pre-production assistance as needed. and “[w]ork in a cross-functional, self directed team environment.” Pre-press employees, warehouse employees, and material handlers regularly assist with the finishing process. Warehouse employees regularly handle binding and kitting work. Binding and kitting employees often work interchangeably.

The Employer posts job openings externally and internally on the Employer’s Intranet and at the Facility; most job openings are filled internally. About eight to 10 months ago, two employees were permanently transferred from the Warehouse Department and became binding employees. Once, on an unspecified occasion, a warehouse employee transferred to the Printing Department. There is no other evidence on the record of any permanent transfers.

### *Wages, hours, and other terms and conditions of employment*

Print operators earn between \$13 and \$18 per hour. Kitting employees, pre-press employees, and material handlers all earn between \$12 and \$15 per hour. The wage rates for binding operators, warehouse employees, forklift drivers, and the maintenance employee are not indicated in the record. All pay raises are based on the same corporate-wide incentive pay system.

During the peak season, print operators, binding employees, kitting employees, material handlers, and warehouse employees work on all three shifts. In non-peak season, print operators work on all three shifts, and binding and kitting employees work on the first two shifts. Pre-press employees generally work one shift, from 8:00 a.m. to 4:00 p.m., Monday through Friday. During peak season, these employees work extended shifts. The maintenance employee works only on the first shift.

All employees punch a time clock and are paid on an hourly basis. They all receive the same medical and vacation benefits and use the same lunch room during the same lunch period. No employees at the Facility wear uniforms.

Forklift drivers require about eight to 10 weeks of training before they are certified. Employees in the other classifications at issue do not require training before assuming their job duties.

The same labor relations policies are maintained corporate-wide. Employees in all departments attend the same monthly meetings. All employees are subject to the same disciplinary procedures, and all employees are reviewed using the same evaluation criteria.

#### **IV. ANALYSIS**

I find that the petitioned-for unit limited to the printing and binding employees is not appropriate and that the smallest appropriate unit consists of all employees involved in the printing and fulfillment processes and the maintenance employee. In making this determination, I considered the factors that the Board uses in making community-of-interest determinations, such as skills, job functions, supervision, terms and conditions of employment, functional integration, employee contact, transfer and interchange.

##### *Employee skills and job functions*

The Employer does not run a skilled printing operation for the vast bulk of the work at the Facility, and employees other than forklift drivers do not require any particular skills or training. With the exception of forklift drivers, any employee can readily substitute for any other employee in the printing and fulfillment processes, and the job functions of binding employees, kitting employees, and material handlers often overlap. Thus, this factor favors finding a community of interest between the printing and binding employees and the other employees that the Employer seeks to include in the unit.

##### *Supervision*

All employees work under the general direction of Vice-President of Operations Michael Kulpinsky. For the first shift, there is separate front-line supervision for the Print Department and the Warehouse Department employees, but for the second and third shifts, employees in both departments are commonly supervised. During peak season, there is a significant complement of employees on the second and third shifts.<sup>10</sup> As first-shift printing and binding employees are separately supervised, but second-shift and third-shift printing and binding employees are supervised in common with warehouse employees, this factor does not clearly favor either the Petitioner's position or the Employer's position.

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<sup>10</sup> The record does not indicate the number of employees on each shift.

### *Wages, hours, and other terms and conditions of employment*

All employees who are part of the printing and fulfillment processes are paid on an hourly basis, and, while the record does not indicate the pay rate of some of the classifications, the wage differential between print operators, pre-press employees, kitting employees, and material handlers is not of great significance. With the exception of the maintenance employee and the five pre-press employees, who only work the first shift, all employees work on the same three shifts. They all receive the same benefits, take the same lunch period, eat in the same lunch area, and punch the same time clock. All employees are subject to the same disciplinary policies and attend the same meetings. Thus, this factor favors the Employer's contention that only a unit of all printing and fulfillment employees is appropriate.

### *Functional Integration*

The printing and fulfillment operations are highly integrated. The process flows from the pre-press employees, who prepare the customer orders, to the print operators, who operate the copy machines. Orders then move to the binding and kitting employees, who complete the orders, to the warehouse employees, who pick and pack the orders and load them for transport. The work areas are physically arranged in the sequence in which the product moves through the system, and the work of employees in one area is dependent on the work having been accomplished by employees in the preceding area. This extensive functional integration favors the Employer's contention that only a unit that includes all employees involved in the printing and fulfillment processes is appropriate.

### *Employee Contact, Interchange and Transfers*

There is extensive contact between employees in various classifications at the Facility. They all work in the same building, and their work tasks often put them in close proximity to each other. Employees regularly transfer customer orders between areas as they move through the production and fulfillment processes. Forklift drivers and material handlers often work in the printing, binding, and kitting areas, and during peak season, printing, binding, and kitting employees frequently work in the warehouse with Warehouse Department employees.

While the print operators largely handle the printing function themselves, there is regular interchange among the binding, kitting, and warehouse employees, most notably during the six-month peak season. During peak times, employees who normally work outside the warehouse at times work in the warehouse area to help with picking, packing and shipping. The various processes involved in the preparation of documents for shipping may be handled in the binding area, kitting area, or warehouse area. Employees in these areas regularly work together to complete customer orders, and employees in any of these areas may perform quality control checks. Moreover, some material handlers and forklift drivers regularly work in the printing, binding, and kitting areas to speed the movement of the customer order.

Pre-press employees are integral for starting the printing process. Kitting employees, material handlers, and warehouse employees regularly complete customer orders, and forklift drivers and material handlers regularly participate in the fulfillment process. There is evidence of

only three permanent transfers between classifications, a relatively small amount considering the number of employees at the Facility. However, as the Employer contends, there is meaningful contact and interchange amongst the various classifications, which favors the Employer's proposed unit. See *Carl Buddig and Co.*, 328 NLRB 929, 930 (1999).

### *Conclusion*

I find that a unit limited to the printing and binding employees is inappropriate because these employees do not possess a community of interest separate and distinct from the pre-printing employees, kitting employees, and employees in the Warehouse Department. There is no discernible difference in the skills of employees, with the exception of the forklift drivers, and there is substantial similarity in the wages, hours and other terms and conditions of employment of all employees. Although first-shift printing, binding, and kitting employees are supervised separately from employees in the Warehouse Department, for the second and third shifts, employees share supervision. Most significantly, the Employer's processes are functionally integrated, and many employees in various classifications regularly perform the duties of employees in other classifications, especially during the peak season. Based on these factors, I find that the warehouse employees share a community of interest with employees in the petitioned-for classifications and should be included in the unit. *Bartlett Collins Co.*, 334 NLRB 484 (2001); *Hotel Services Group, Inc.*, 328 NLRB 116 (1999); *Chromalloy Photographic Industries*, 234 NLRB 1046 (1978).

In *AGI Klearfold, LLC*, 350 NLRB No. 50 (2007), the Board decided to include press employees with pre-press employees as the two functions were closely integrated, but decided not to include other classifications along the printing process, such as post-press employees. In excluding post-press employees, the Board relied on well-established law favoring separation of traditional crafts in the printing industry. See e.g., *A.B. Hirschfeld Press, Inc.*, 140 NLRB 212, 216 (1962); *Earl Litho Printing Co.*, 116 NLRB 1538, 1539 (1956). This preference for separation of crafts does not apply to the instant case, however, since the Employer does not operate a traditional press operation at the Facility but instead produces documents using copy machines. The classifications at issue are not the type of skilled craft employees found in traditional press operations.

The maintenance employee must also be included as he works in close proximity to other employees in all of their classifications in the unit and sometimes repairs their machines. Moreover, he would otherwise be the only non-administrative employee of the Employer outside the unit and, absent inclusion in the unit, would have no representational rights. The Board disfavors such results. *North Jersey Newspapers Co.*, 322 NLRB 394, 396 (1996); *Gateway Equipment Company*, 303 NLRB 340, 342 (1991). He shall therefore be included in the unit.

## **V. CONCLUSIONS AND FINDINGS**

Based upon the entire record in this matter and for the reasons set forth above, I conclude and find as follows:



1. The Hearing Officer's rulings made at the hearing are free from prejudicial error and are hereby affirmed.

2. The Employer is engaged in commerce within the meaning of the Act, and it will effectuate the purposes of the Act to assert jurisdiction in this case.

3. The Petitioner claims to represent certain employees of the Employer.

4. A question affecting commerce exists concerning the representation of certain employees of the Employer within the meaning of Section 9(c)(1) and Section 2(6) and (7) of the Act.

5. The following employees of the Employer constitute a unit appropriate for the purposes of collective bargaining within the meaning of Section 9(b) of the Act:

All full-time and regular part-time pre-press employees, print operators, binding operators, kitting employees, material handlers, forklift drivers, warehouse employees, and the maintenance employee, employed by the Employer at its 700 Nestle Way, Breinigsville, Pennsylvania facility, **excluding** customer service employees, offset print employees, emergency health and safety (EHS) employees, contracted employees, and other employees, guards, and supervisors as defined in the Act.

The Petitioner's showing of interest may now be inadequate due to the additional employees included in the unit as a result of this Decision. Accordingly, the Petitioner should advise the undersigned Regional Director as to whether or not it wishes to proceed to an election in the unit found appropriate, and the Petitioner has 14 days from the issuance of this Decision to augment its showing of interest, if necessary. See NLRB Casehandling Manual (Part Two), Representation Proceedings, Sec. 11031.2. If the Petitioner fails to submit an adequate showing of interest within this period, or to withdraw the petition, the petition will be dismissed without further order. The Direction of Election set forth below is thus conditioned on the Petitioner having an adequate showing of interest. See *Alamo Rent-A-Car*, 330 NLRB 897 (2000). In the event that a request for review is filed with respect to this Decision, the foregoing requirement will be suspended until the Board rules on the request for review.

## **VI. DIRECTION OF ELECTION**

The National Labor Relations Board will conduct a secret ballot election among the employees in the unit found appropriate above. The employees will vote whether or not they wish to be represented for the purposes of collective bargaining by the **International Chemical Workers Council of the UFCW**. The date, time, and place of the election will be specified in the Notice of Election that the Board's Regional Office will issue subsequent to this Decision.

**A. Eligible Voters**

The eligible voters shall be unit employees employed during the designated payroll period for eligibility, including employees who did not work during that period because they were ill, on vacation, or were temporarily laid off. Employees engaged in any economic strike, who have retained their status as strikers and who have not been permanently replaced are also eligible to vote. In addition, employees engaged in an economic strike, which commenced less than 12 months before the election date, who have retained their status as strikers but who have been permanently replaced, as well as their replacements are eligible to vote. Employees who are otherwise eligible but who are in the military services of the United States may vote if they appear in person at the polls. Ineligible to vote are: 1) employees who have quit or been discharged for cause after the designated payroll period for eligibility; 2) employees engaged in a strike who have been discharged for cause since the commencement thereof and who have not been rehired or reinstated before the election date; and 3) employees engaged in an economic strike which began more than 12 months before the election date who have been permanently replaced.

**B. Employer to Submit List of Eligible Voters**

To ensure that all eligible voters may have the opportunity to be informed of the issues in the exercise of their statutory right to vote, all parties to the election should have access to a list of voters and their addresses, which may be used to communicate with them. *Excelsior Underwear, Inc.*, 156 NLRB 1236 (1966); *NLRB v. Wyman-Gordon Company*, 394 U.S. 759 (1969).

Accordingly, it is hereby directed that within seven (7) days of the date of this Decision, the Employer must submit to the Regional Office an election eligibility list, containing the **full** names and addresses of all the eligible voters. *North Macon Health Care Facility*, 315 NLRB 359, 361 (1994). The list must be of sufficiently large type to be clearly legible. To speed both preliminary checking and the voting process, the names on the list should be alphabetized (overall or by department, etc.). This list may initially be used by me to assist in determining an adequate showing of interest. I shall, in turn, make the list available to all parties to the election, only after I shall have determined an adequate showing of interest among the employees in the units found appropriate has been established.

To be timely filed, the list must be received in the Regional Office, One Independence Mall, 615 Chestnut Street, Seventh Floor, Philadelphia, Pennsylvania 19106 on or before **July 7, 2008**. No extension of time to file this list shall be granted except in extraordinary circumstances, nor will the filing of a request for review affect the requirement to file this list. Failure to comply with this requirement will be grounds for setting aside the election whenever proper objections are filed. The list may be submitted by facsimile transmission at (215) 597-7658, or by electronic filing through the Agency's website at **www.nlr.gov**. Guidance for electronic filing can be found under the **E-Gov** heading on the Agency's website. Since the list will be made available to all parties to the election, please furnish a total of two (2) copies, unless the list is submitted by facsimile or e-mail, in which case no copies need be submitted. If you have any questions, please contact the Regional Office.

### **C. Notice of Posting Obligations**

According to Section 103.20 of the Board's Rules and Regulations, the Employer must post the Notices to Election provided by the Board in areas conspicuous to potential voters for a minimum of three (3) working days prior to the date of the election. Failure to follow the posting requirement may result in additional litigation if proper objections to the election are filed. Section 103.20(c) requires an employer to notify the Board at least five (5) working days prior to 12:01 a.m. of the day of the election if it has not received copies of the election notice. *Club Demonstration Services*, 317 NLRB 349 (1995). Failure to do so estops employers from filing objections based on non-posting of the election notice.

## **VII. RIGHT TO REQUEST REVIEW**

Under the provisions of Section 102.67 of the Board's Rules and Regulations, a request for review of this Decision may be filed with the National Labor Relations Board, addressed to the Executive Secretary, 1099 14th Street, NW, Washington, D.C. 20570-0001. A request for review may also be submitted by electronic filing through the Agency's website at [www.nlr.gov](http://www.nlr.gov). A copy of the request for review must be served on each of the other parties to the proceeding, and with the Regional Director either by mail or by electronic filing. Guidance for electronic filing can be found under the **E-Gov** heading on the Agency's website. This request must be received by the Board in Washington by 5:00 p.m., EST on **July 11, 2008**.

Signed: June 27, 2008

at Philadelphia, PA

/s/ [Dorothy L. Moore-Duncan]  
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DOROTHY L. MOORE-DUNCAN  
Regional Director, Region Four